

DECLARATION OF GERALD ARMSTRONG

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I, GERALD ARMSTRONG, hereby declare:

1. At approximately 4:10 p.m. on Monday, October 21, 1985, I received a call at work from a man who identified himself as Tim Leonard with the FBI in Boston. Mr. Leonard informed me that someone had filed a complaint with the FBI accusing me of a crime. On my insistence he acknowledged that Scientology was involved in the matter. I agreed to be interviewed by him today at 11:00 a.m.

2. I met today with Mr. Leonard who showed me his FBI identification card. During the interview, Mr. Leonard informed me that the charge he was investigating was "impersonation of an FBI agent." He would not tell me who had filed the complaint; however, he did inform me of the following details:

A. The alleged incident occurred on Sunday, October 13, at 2:00 p.m. near the Massachusetts Bay Transportation Authority (MBTA) Green Line Auditorium stop in Boston.

B. My accuser was a "body router" for Scientology, handing out cards for the organization's "free personality test."

C. My accuser stated that he approached me to get me

1 to come in for a free personality test and I said
2 "I'm an FBI agent. I know all about your organization.
3 Ron is hiding out even from his own people. We're going
4 to wipe you out within two years."

5
6 D. My accuser returned to the Boston organization
7 and with the assistance of his seniors identified me
8 as the individual to whom he had "spoken."

9
10 E. My accuser stated that I was with another individual.
11 Mr. Leonard did not have a physical description of this
12 individual, and did not know if the individual was male
13 or female.

14
15 3. I have never impersonated, nor identified myself
16 as an FBI agent or any other government official or employee
17 at any time. I have never led anyone to believe by any act on
18 my part that I was an FBI agent or a government official or
19 employee.

20
21 4. On October 13, 1985, at 2:00 p.m., I was at my
22 residence, writing. I did not travel anywhere all day.

23
24 5. I was not at the location described to me by Mr.
25 Leonard on October 13. In fact, I have never been to that
26 location in Boston, nor anywhere close to that location.

27
28 6. I have never talked to, since my arrival in Boston,

1 anyone whom I knew to be, or identified himself or herself as,
2 a Scientologist. Since coming to Boston I have never to my
3 knowledge been approached by a Scientology "body router."
4

5 7. The criminal complaint by the Scientology
6 organization is completely false. Any "evidence" is
7 "manufactured" pursuant to L. Ron Hubbard's policy attached
8 hereto as Exhibit A, which states:

9 "If attacked on some vulnerable point by anyone
10 or anything or any organization, always find or
11 manufacture enough threat against them to cause
12 them to sue for peace."

13 L. Ron Hubbard

14 HCOPL 8/15/60
15

16 8. This is not the first time Hubbard or Scientology
17 has sought to bring phony charges against me. They attempted the
18 same using the Los Angeles Police Department in 1983 during the
19 pendency of my civil lawsuit in the Los Angeles Superior Court.
20

21 I declare under the penalty of perjury under the laws
22 of the State of California that the foregoing is true and correct.
23

24 Executed this 23rd day of October, 1985 at Boston,
25 Massachusetts.

26

27

28


GERALD ARMSTRONG

HUBBARD COMMUNICATIONS OFFICE
37 Fitzroy Street, London, W.1

HCO POLICY LETTER OF 15 AUGUST 1960
Re-issued from Sthil

Assn Secs
HCO Secs

DEPT OF GOVT AFFAIRS

(Cancels any previous directions to set up a Special Zone Dept)
(This Policy Letter is mandatory all Central Organizations)

There shall be established on a board level and outside the structure of the Central Org and HCO but under the board of HASI Ltd, a new department to be called "The Department of Government Affairs".

More and more, as governments disintegrate under the threat of atomic war and communism, central organizations have had to give high executive time to governmental affairs to the great loss of the organizations themselves. The enturbulence entered into Scientology activities by legal matters, tax matters, and matters of assisting governments to maintain stability, has sapped our time and fixed our attention to our own loss.

Now to remedy this situation, I wish to contain and cordon, in a military sense, this incursion and to prohibit utterly and completely such entrance (of these matters or our own project for governments) into Central Org or HCO comm lines. In other words, Central Orgs and HCOs are run by, for and as Scientology service and activity units and the special Department of Government Affairs shall handle other matters and specifically deny such non-Scientology matters entrance into organizational comm lines.

The Department of Government Affairs shall be headed and directed with a minimum of personnel and shall not be able to call upon the personnel of the Central Org or HCO for further assistance than the relay of communications.

The Director of Government Affairs shall be a fully qualified person of good judgement subject to control of the Board of Directors and shall be subject to the advices and directions of the Board and the HCO and Assn Secretary. Only Washington and South Africa are excluded from supervision of the Dept by the Assn Sec, Org Sec and HCO Sec. In all other offices the Director of Government Affairs shall be subordinate to the Assn Sec and HCO Sec.

Under this department comes the corporation's solicitors, attorneys, chartered accountants and any attorney or accountant hired directly by the corporation for outside legal or tax or filing purposes.

The allotment and issue of shares comes under this department, but the actual invoicing and banking shall be done as always by the Dept of Accounts or, for HCO, by the HCO Secretary.

All contracts, filings with the government, all tax reports and their preparation, corporation minutes, annual meetings, legal papers, suits against and by the corporation, whether HASI Ltd or HCO Ltd, all legal investigatory work and detectives, all contacts with government agents, bureaus and departments, all assistance to governments, messages to governments, handling answers from governments or courts shall be cared for by the Department, whether to advance or protect Scientology or its corporations by government or legal channels.

All legal documents and the Valuable Document files for HCO and HASI shall be kept by the Department in a proper safe in accordance with previous rules written for the keeping and handling of valuable documents.

All share sales reports and all legal, governmental and corporation reports to be made to the boards shall be made to it by this Department.

No shares may be advertised or issued save with the approval of this department.

No contracts, purchases or mortgages may be undertaken without the approval of this Department and then only by the action of this Department.

It is clearly understood that the Department shall not undertake financial management for the Central Org or HCO nor may it direct the Central Org or HCO on purely Scientology affairs or Scientology dissemination except where these may impinge directly upon the government, and even then this Department is enjoined from forcing government laws or rulings upon the Central Org or HCO by threat of danger or ominous advices, nor may the Department employ either solicitors nor accountants who specialize in ominous advices to the Orgs since the Orgs could be discouraged or impeded by such.

The object of the Department is to broaden the impact of Scientology upon governments and other organizations and is to conduct itself so as to make the name and repute of Scientology better and more *forceful*. Therefore defensive tactics are frowned upon in the department. We are not trying to make the Central Orgs and HCOs "be good". We are trying to make their reach more secure and effective. Only attacks resolve threats.

In the face of danger from Govts or courts there are only two errors one can make: (a) do nothing and (b) defend. The right things to do with any threat are to (1) Find out if we want to play the offered game or not, (2) If not, to derail the offered game with a feint or attack upon the most vulnerable point which can be disclosed in the enemy ranks, (3) Make enough threat or clamor to cause the enemy to quail, (4) Don't try to get any money out of it, (5) Make every attack by us also sell Scientology and (6) Win. If attacked on some vulnerable point by anyone or anything or any organization, always find or manufacture enough threat against them to cause them to sue for peace. Peace is bought with an exchange of advantage, so make the advantage and then settle. Don't ever defend. Always attack. Don't ever do nothing. Unexpected attacks in the rear of the enemy's front ranks work best.

Never put the organization on "wait" because of courts or other matters. It's up to the Department to make the actions of HCO Secs and Org Secs *right*, not enjoin right actions on the HCO and Org Secs.

To win we must have treasure and verve. If a Central Org and HCO function perfectly as service units then treasure and consequent security for the further advance are to hand. If the Department operates with verve and elan, even with rashness, it will afford a screen behind which organizations can work.

Example: BMA attacks Scientology in Australia via the government. Answer: throw heavy communication against the weakest point of the BMA—its individual doctors. Rock them with petitions to have medical laws modified which they are to sign. Couple the BMA attack with any group hated by the government. Attack personally by threats or suits any person signing anything for the BMA. Slam the matter into politics, advance a bill into parliament that strips the BMA of all legal rights by opening healing to all. Make the attack by the BMA look ridiculous. Attack medical practices. Investigate horrible practices loudly. (*Always* investigate loudly never quietly.) Make the distinct public and governmental impression and BMA impression that they've run into a barrage of arrows or electronic cannon and that continued attack by them will cause their own disintegration. As all this is being done on a thought or idea level the restimulation of their engrams results in the total impression that they are surrounded by their own dead and the battery may fire again at any minute. And if one makes in writing not one slanderous or libelous statement, there is no defense by them. This example is patterned on what just happened and what we did in Australia where we are winning strongly.

The personnel of the Department should be freed of past track legal and governmental overts by the HGC using evening auditing. This is a must or the Department will otherwise attract attacks. Further, the higher the department personnel is raised on "control" through running help, the less action will have to be undertaken by it and the more it will actually accomplish without violent action.

The goal of the Department is to bring the government and hostile philosophies or societies into a state of complete compliance with the goals of Scientology. This is done by high level ability to control and in its absence by low level ability to overwhelm. Introvert such agencies. Control such agencies. Scientology is the only game on Earth where everybody wins. There is no overt in bringing good order.

The offices of the Department, so far as is possible, should be so situated as to bring no government traffic into the main avenues, comm lines or halls of the Central

Organization or HCO or so as to divert it to the maximum extent from said avenues, comm lines and halls.

The following personnel appointments are made, conditional to acceptance, as Directors of Government Affairs:

United States:	Marilynn Routsong	Los Angeles:	Dick Steves
South Africa:	Jack Parkhouse	Australia:	Denny Gogerly
London:	George Hay	New Zealand:	Steve Stevens.

In the United States and South Africa the head of the Department of Government Affairs shall be also Trustee or Area Director of the Central Organization while the Org Sec and Assn Sec shall not be, but will be officers of the corporation.

This policy letter and these appointments are prompted by the following facts:

1. My own traffic on government legal affairs is far too heavy and I need help of magnitude on a continental level.
2. HCO Secs and Assn Secs are having difficulty holding down their Orgs and the field because of the time demanded by government affairs.
3. The activity will get heavier rather than lighter.
 - (a) The deterioration of government order is accelerating with consequent confusion in all related affairs;
 - (b) Increasing amounts of order must be maintained by us at a governmental level against the possibility of finding our areas without governments.
4. We are about to file HASI Ltd and HCO Ltd in all areas with the attendant heavy legal and governmental action necessary.
5. We are about to arrange for the release of and the issue of over half a million pounds of shares to the public, thus making heavy demands on legal and government lines.
6. We are about to finance and erect various media of communications, such as radio stations, on the various continents and this will require enormous amounts of liaison and action in such a department.
7. We are about to finance and find new quarters in the United States and such activities come under the new Department.
8. Due to new clearing techniques, our sphere of control is widening. This is purely a case phenomenon, but will be felt heavily by Orgs in the future. It is necessary to provide comm lines for this widening of influence.

LRH:js.gh.cden
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L. RON HUBBARD

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Amer's full name is Amer Fadili Al Tamimi. At this time (1982), he was a student at Northeastern University in Boston, Massachusetts. He was living in the Fellsvue Terrace Apartments, Apartment Number 113, in Stoneham, Massachusetts. This building was owned by my older brother Adel Fadili Al Tamimi. Amer is presently (1984) living with my parents in Sharjah, United Arab Emirates.

I then drove in my Cadillac Seville and picked up Amer. We went to the Hilltop Restaurant in Saugus, Massachusetts. I questioned Amer about owing anyone \$40,000. Amer told me that he must pay \$40,000. Amer said that and his people have been after him for three weeks. Amer explained everything to me. Amer wanted to know how I knew about the gambling debt. I merely told him that I had found out. I didn't mention that Mr. Hollingsworth had told me.

I then used a pay phone at the restaurant and phoned Mr. Hollingsworth. I asked him if it was possible to meet that night over drinks. Mr. Hollingsworth said yes.

Later that day, at about 7:00 PM, I met Mr. Hollingsworth at a restaurant close to Union Wharf. I believe it's called "Josephes" or something similar. I walked in and he was standing at the bar. We shook hands. Mr. Hollingsworth bought me a drink and started telling me more about Amer and the \$40,000 gambling debt. I told Mr. Hollingsworth that I had spoken with Amer about

because he had to return to his office and meet his wife. Mr. Hollingsworth told me that it was possible that Amer wouldn't have to pay any money to me, not even one dollar, if I did some business with those boys in town. Mr. Hollingsworth told me that those boys knew me well and liked me, believe it or not. Mr. Hollingsworth stated that the "business" meant working with lawyers and classy people. He said I could make myself big money. Mr. Hollingsworth then told me, "As I told you before in my office, I know everything about you. You like to play and I have a nice game for you."

Mr. Hollingsworth said that he and his friends knew they could trust me. He asked if I was willing to do some business. He then said that he could arrange a meeting soon because the "game" must be done. Mr. Hollingsworth said that this was big money, more than the German deal. He asked if I knew what he meant. I told him to continue. I then asked him how much money he was speaking about and how much money would I receive. Mr. Hollingsworth told me the deal was for two or three million dollars and maybe even more. He said I would get 20% in my pocket. I asked Mr. Hollingsworth when the deal would happen and who was involved. Mr. Hollingsworth said the deal would take place in the USA and I would make good friends with the people I met. These people would also help me with my German problem with Mr. Jurgens. Mr. Hollingsworth also added that he could help me with my German problem because

gambling. I told Mr. Hollingsworth okay and thanks. I then asked what was to happen next. He told me to phone him at about 11:00 AM the next day. He said that he must first clear Amer's problem, and then he would tell me where to go to meet a friend. He said he would take it from there. Mr. Hollingsworth told me that he had to leave. We both left the restaurant. I asked him if he needed a ride to his office and he said no thank you and I told him I would call him the next day.

The next morning, I called Mr. Hollingsworth at his office. He told me to go to Kenmore Square in Boston and meet me. I would be sitting in a black Mercedes Benz sports car, parked in front of the Greek Restaurant. Mr. Hollingsworth told me that he would be at his office until 6:00 PM and told me to phone him later. He wished me luck and said goodbye.

At noon I drove to Kenmore Square, saw the black Mercedes Benz and pulled up behind it. I was driving the Mercedes Benz waved his hand, indicating I should follow him. I followed him. About five minutes later, he pulled into a small parking lot of a motel on Boylston Street. I parked my car next to him. We shook hands and he said hello Ala. He introduced himself as

and I walked into the small restaurant at the motel. We walked over to a gentleman dressed in a dark suit, having a cup of coffee. The man stood up and said, "So you are Ala." He said his name was and said he knew my brother Amer. invited me and I to sit with him at his table. We all drank coffee. told me that Amer was a nice boy and he liked him. told me not to worry about Amer and the \$40,000 gambling debt. said that I was his friend now and that Mr. Hollingsworth was a good friend of his who had spoken good things about me. continued talking and told me that he wanted to meet me and tell me personally that no one would bother Amer anymore. also said that Mr. Hollingsworth told him that I was going to join them for some business dealings. I told that was correct and that I was very happy to do business with him.

then asked me if I liked to make big money. I answered I sure did. I asked him the same question. told me that he wasn't joking. He said that there are big, nice and important people involved in what we were going to do. He said that if I work with them and do good, the deal was a real big one, coming very soon, that was in the millions of dollars. He asked if I knew what he meant. I told that he had lost me and that I didn't know what he was talking about. I asked him what it was that we were doing and what it was that I could do for him. said that it wasn't "we" it was "me" that was doing it and he knew that I would do the best.

I asked to tell me about the deal. said that the deal was between two and three million dollars in counterfeit checks. He told me that he would introduce me to another friend of his. This friend was a very good friend of his and Mr. Hollingsworth. The friend was also a lawyer with offices on Union Wharf, he told me. I asked for the friend's name. told me that I would meet him soon. I told him okay.

then told me that was his personal friend. told me that would be the one who would be in touch with me about the deal. warned me to be careful to never tell anyone about meeting him, not even Amer. He also told me to tell Amer that I had taken care of the \$40,000 gambling debt for him. told me that would phone me the next day at 10:00 AM. He said that we would have another meeting. He stood up and we shook hands. I told him that it was nice meeting him and I left.

phoned me at about 10:00 AM the next day. asked if I could meet him sometime that afternoon. We agreed to meet at 2:00 PM in the parking lot of the Palace Disco Night-club in Saugus, Massachusetts. We met at 2:00 PM and was driving the same Mercedes Benz



Ala: "Mr. Hollingsworth then started speaking about the possibility of some day doing business with me. It looked like he was waiting for me to say something."

the gambling debt. I told Mr. Hollingsworth that I never mentioned any names to Amer, and that Amer was very worried and that there were people bothering him about the debt. I told Mr. Hollingsworth that Amer had no money to pay the gambling debt. I also told Mr. Hollingsworth that I wasn't going to pay the debt because it was a gambling debt, rather than a debt for something Amer had purchased.

Mr. Hollingsworth then told me to listen to him carefully. He said that he only had a few minutes

he knew all the FBI agents in Boston and most of the United States Attorneys. He said that I would be doing business with smart people and that I would see that what he was telling me was true.

I told Mr. Hollingsworth okay. I told him that I like to make money and I would be happy to meet good, new friends. I then asked about Amer's situation. Mr. Hollingsworth told me not to worry about it for the time being and just leave it all up to him. Mr. Hollingsworth told me to trust him. He also told me to please tell Amer to stay away from

asked if I was free the next day so I could meet [REDACTED] for breakfast at the Colonnade Hotel in Boston, Massachusetts, at 10:00 AM. I told [REDACTED] that was fine. [REDACTED] then said that [REDACTED] had also instructed that I park my car somewhere in Boston and take a taxi to the hotel. [REDACTED] and I were together about five minutes; then we each left.

The following day at about 9:30 AM, I parked my car in Quincy Market in Boston. I then went by taxi to the Colonnade Hotel. I arrived at the hotel a few minutes before 10:00 AM. [REDACTED] was in the lobby and said good morning to me. I said hello and we both walked into the restaurant. I saw Mr. Hollingsworth, [REDACTED] and another man sitting at a table in the restaurant. I said good morning to everyone and shook hands with Mr. Hollingsworth and [REDACTED]. Mr. Hollingsworth told me to say hello to Michael Flynn. I said hello to Mr. Flynn. Mr. Flynn said "Hi Ala, nice to meet you."

We all had breakfast and the others were talking about sports. Then Mr. Hollingsworth asked me how Amer was. I told him Amer was fine. [REDACTED] said that he liked Amer and that Amer was a nice boy. I told [REDACTED] thanks.

Just after this, Mr. Flynn looked at me and asked if they were going to make money with me or if I was going to run away with the money. I answered Mr. Flynn by asking him which money he was talking about, and what did he mean. Everyone else at the table was looking at Mr. Flynn and me as we talked. Mr. Flynn told me that he knew more about me than I thought. He said I was a very intelligent and smart man but that I needed good advice before I did my business. Mr. Flynn told me that whatever I did he would like to advise me and make money with me. He said we would have good relations and make good money. Mr. Flynn said that he and everybody at the table all liked me, trusted me and we all had a great chance to make over two million dollars within 45 days. Mr. Flynn told me that if I was willing to work with them and to make money that I would get 20% of the deal. Mr. Flynn told me that if I was ready I must move fast starting today. I told Mr. Flynn I was ready.

Mr. Flynn told me, "Okay Ala, hear me well. First, I trust you so do not f---k us because you have a brother and son in Boston — so let's be friends." Mr. Flynn said, "Hear me well, this is the baby."

It was now about 11:00 AM. Everyone of us was looking at Mr. Flynn and giving him our complete attention. Mr. Flynn was looking at me and started speaking. Mr. Flynn said to me that he had a great connection in the Bank of New England in Boston, and the connection was a man who could be trusted. The man at the bank would give us inside bank information like which accounts were good. Mr. Flynn said that he and his man at the bank were all ready and they know which accounts were good and which accounts we were going to get. Mr. Flynn said that the man at the bank is also going to bring us legitimate checks to make copies of, but, we could only keep these checks for four days. The man at the bank can remove the legitimate checks for us but he must return them so they can be sent back to where they belong. Mr. Flynn was still looking at me and asked me if I understood. I told him I did and said to continue. Mr. Flynn continued telling me that this man at the bank is going to process the counterfeit checks through the computer and clear the checks. The checks will then be held at the bank and no one will find out for about 15 days. Mr. Flynn said that all he cared about is that the checks cleared. Mr. Flynn was still looking at me when he spoke.

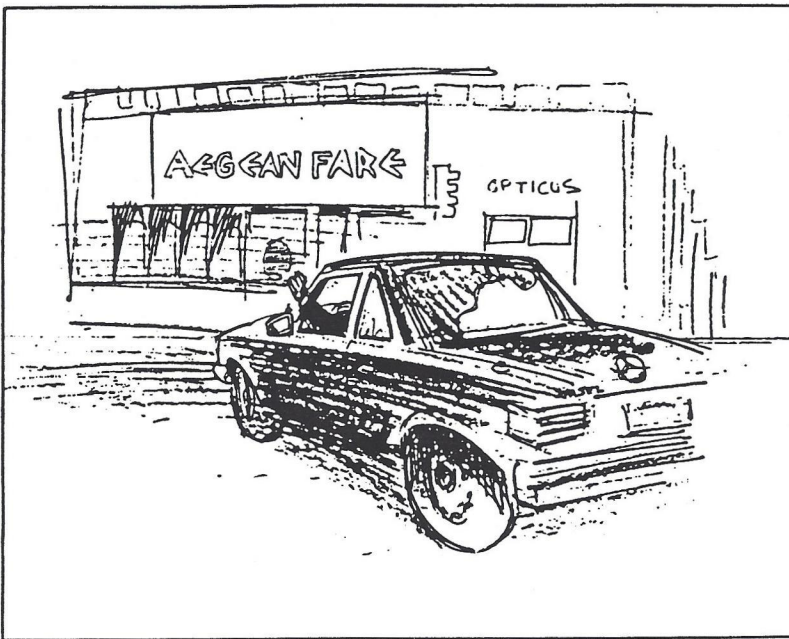
Mr. Flynn then said that my part was to find someone who would make the checks. I would only have four days from the day I got the legitimate checks to do the work that had to be done, and the work needed to be done well. Mr. Flynn said that he knew that I had the connections and could do it. Mr. Flynn told me that after I have the checks made he will have to see them and proof them. Mr. Flynn said that was first. Second, he said I must deposit the checks in a bank and make arrangements with that bank to make a telephone transfer to

anywhere I want. He said that to do this I must go to an international bank; but, he said, that was my part of the operation.

Mr. Flynn said that he wanted me to deposit the checks in a bank, leave \$100,000 at that bank and transfer all the rest of the money out. Mr. Flynn said that he would take care of the rest. He said the money would be going outside the USA. Mr. Flynn said that my part would be to make the checks and have them deposited. Mr. Flynn said that his part will be to clear the checks and send the money back

business and has many friends. I told [REDACTED] that I had a little business that I wanted him to do for me but he must get me the best printer in town.

[REDACTED] is always hungry for a dollar. He's always broke. He dresses well but never has any money in his pocket because he spends it on cocaine. I told [REDACTED] that I needed someone to make me some bank checks within a two-day time limit and the job must be the best. So I told [REDACTED] to go and find the best man for me and tell him to get ready to print the checks for me.



Ala: "At noon I drove to Kenmore Square, saw the black Mercedes Benz and pulled up behind it. [REDACTED], driving the Mercedes Benz, waved his hand, indicating I should follow him."

to the bank account I opened. Mr. Flynn said that then I would transfer the money from this bank account and he would make the collection arrangements for the cash. Mr. Flynn asked me if I understood the deal. I told him I did.

Mr. Flynn told me to never phone him, Mr. Hollingsworth, [REDACTED] or [REDACTED]. In addition, I was to never visit them at their offices or keep their names or telephone numbers to make it appear like I never met them or knew them. Mr. Flynn said that we would meet again and have drinks outside the USA. Mr. Flynn told me that [REDACTED] would contact me on a daily basis but I was never to speak on the phone. [REDACTED] would phone me and then we would meet in person and conduct business. Mr. Flynn said to me that [REDACTED] would be the man who would speak for all of them and asked if I understood this. I said I did.

I asked Mr. Flynn when I would be getting the legitimate checks and who would be paying my expenses. Mr. Flynn smiled and told [REDACTED] that he thought I was ready to move that day. Everyone started joking and they had big smiles. Mr. Flynn looked at me and told me that [REDACTED] would be calling me in two days and by that time I should have my homework done and should know what I needed. I told Mr. Flynn okay.

I looked at [REDACTED] and told him to call me at about 11:00 AM in two days. [REDACTED] said okay. The breakfast meeting ended just before 12:00 noon.

The next day, I met with a friend of mine named [REDACTED] [REDACTED] is in the printing

The following day [REDACTED] called me and we met at the Hilltop Restaurant in Saugus. [REDACTED] told me I should be getting ready because I would be getting the legitimate checks in about a week. [REDACTED] also asked me what I needed. I told [REDACTED] I needed \$25,000 for front expenses. [REDACTED] said it was too much money. I told [REDACTED] to go and ask Michael Flynn for \$25,000 and tell him I need by tomorrow. I needed the money to prepare many things and pay people up front. [REDACTED] said okay, but said he thought it was too much money. [REDACTED] told me he would call me that night or the next day.

[REDACTED] called me the next morning and we later met at the Hilltop Restaurant in Saugus. [REDACTED] brought me \$10,000 cash and told me he would bring me the other \$15,000 soon. We parted. [REDACTED] started calling me two or three times a day for a week to meet his friend the printer. [REDACTED] wanted to make the fast dollars for finding me the right printer.

It had now been about a week since the breakfast meeting and I was still waiting for [REDACTED] to bring me the legitimate checks.

A day to two later, [REDACTED] called me in the early morning to set up a meeting. I met him at 4:00 PM in Dunkin' Donuts close to Union Wharf. [REDACTED] gave me an envelope and told me it contained five checks. He said he had just gotten the envelope and checks from Michael Flynn. [REDACTED] said I must return the checks back to him within four days. [REDACTED] said Michael Flynn sent his regards, wished him good luck and said to be careful with the

I am twenty-three years of age. I was born on 7 July 1962. I presently live in the same state that I was born, Sharjah, in the United Arab Emirates. I was the person who took two counterfeit checks in the amounts of Two Million Dollars and One-Half Million Dollars to the Middle East Bank in New York City on, or about, 7 June 1982. I attempted to open an account with these two checks. I told the man who worked in the bank that my name was Aquil Abdulamiar. I endorsed both checks with the name of Aquil Abdulamiar. The following is a chronological explanation of the circumstances surrounding this incident. It is to the best of my knowledge and recollection. I travelled to the United States from the United Arab Emirates about one month before I took the checks into the Middle East Bank. I flew from Dubai to Boston. I had to change planes in Paris. I flew on Air France and British Airways. I had purchased roundtrip airline tickets in the United



Wharf, . . . ■■■■ gave me an envelope he had just gotten the envelope and checks

Arab Emirates. My return ticket was for an open return, up to one year later.

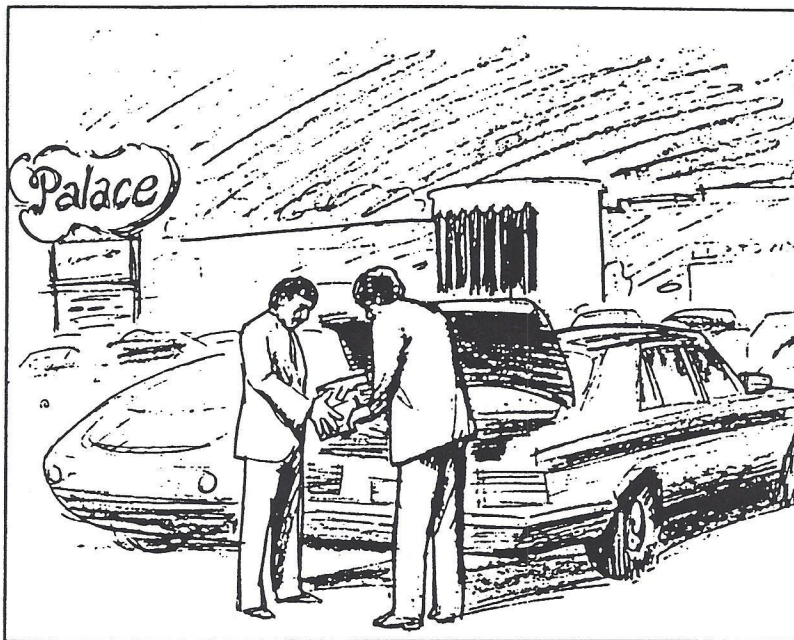
My brother's name is Ala. Ala was living in Saugus, Massachusetts, during this time. Ala's Boston Attorney, Danny Lenzo, picked me up from the Boston Airport. Danny Lenzo said that Ala had been arrested.

Ala:

The M.D.C. Police arrested me and checked my car. The police found the different inks and the scale and other things. They asked me what the things were for. I told them the items were samples going to Saudi Arabia. The police took me to the Revere Police Station. I was fingerprinted and photographed and then taken to the Peabody Police Station. I was released the same day.

Akil:

We drove to the jail and bailed out Ala. After this, Danny Lenzo, Ala and I went to the Colonial Hotel in either Lynn or Saugus, Massachusetts, and ate



Ala: "I told him about the list of things my printer needed. I gave him the list to show it to Michael Flynn . . . About ten days later, ■■■■ called me and asked me to meet him at the Palace Disco parking lot in Saugus. I met ■■■■ and he gave me three boxes."

dinner. The hotel is located on Route One.

Ala:

Two days later, in the evening, I met ■■■■, the printer, in a parking lot of a shopping center in Brockton. I gave all the things I got from ■■■■■■■■■■. He told me everything he needed was there. I asked how long it was going to take him to make the checks. He asked me to call him at work or at home and gave me his two phone numbers. I was in touch with ■■■■ every day and every night. I also visited him twice at night at work. After about seven days, he finished the job and gave me the checks. The checks were perfect. He did excellent work. I gave him \$3,000 and I gave \$1,000 to ■■■■■■■■■■.

■■■■ had been calling me every day but I never met with him because the checks were not ready. Finally, I met ■■■■ during the afternoon in the same Dunkin' Donuts. I gave ■■■■ the checks and I asked him to get me \$15,000 that night.

Later, I met with ■■■■ again. ■■■■ had a big smile on his face. ■■■■ said Michael Flynn loves the checks and he had asked Mr. Flynn to get the \$15,000 that night. ■■■■ also added that Michael Flynn said the checks were perfect, especially the signatures. ■■■■ said that Mr. Flynn sent his regards to me. ■■■■ then said that Mr. Flynn said he was going to put the numbers, names and dates on the checks but we must wait for Mr. Flynn's man at the bank to tell us when. ■■■■ said that Mr. Flynn needed to know from me the name that will go on the checks and reminded me that it has to be the same name opening the account at the bank. I told ■■■■ that I would give him the name within two days. I then asked ■■■■ where the money was. ■■■■ said that he was going to get all the money right then. He asked where he could meet me that night. I told him I would be at the Palace Disco in Saugus. ■■■■ came to the Palace Disco that night and gave me the \$15,000.

I had arranged for ■■■■■■■■■■ from the North End of Boston, to open the account using the

counterfeit checks. I had false identification for him. However, I could not locate him. I don't know where he went. I had no one to use to go to the bank for me.

I had already chosen which bank I was going to use, the Middle East Bank in New York City. This bank is owned by the Al Fotame family, from the United Arab Emirates. They are Arabs. The bank is managed by Pakistanis. Most Pakistanis are stupid and I thought they process the checks. I have met the manager of this bank in the past and had his personal card. I chose the name "Aquil Abdulamiar" to go on the checks and decided to use my brother, Akil Fadili Al Tamimi, to present the checks and open the account at the Middle East Bank. Akil's long Arabian name is Akil Abdul Amir Fadili Al Tamimi. I changed the spelling of Akil to Aquil and changed Abdul Amir to Abdulamiar. This gave the name more of an Italian spelling, yet would still enable Akil to use his real name to open the account or transfer money.

Akil:

I stayed with Ala in his home. About ten days before I took the checks to the Middle East Bank, Ala began telling me what he wanted me to do. Ala told me that a Boston Attorney named Michael Flynn had gotten hold of two legitimate checks from the Bank of New England in Boston. Michael Flynn gave the checks to Ala. Ala had counterfeit copies of the checks made. Ala told me that all I had to do was open the account and deposit the checks. I did not have to cash the checks and receive money. Ala said that he and Michael Flynn were going to make the arrangements to get the money after the checks were cleared in the Bank of New England.

Ala told me that he had decided to use the name "Aquil Abdulamiar" on both counterfeit checks. Ala chose this name because it's very similar to some of the words in my real name. Ala changed the spelling of my real name "Akil" to "Aquil" and changed the spelling and format of my names

"Abdul Amir" to "Abdulamiar." Ala said that this would make it easy for me to use my real passport as I.D. to open the account. All I would have to say was that my name had been misspelled on the checks.

I practiced writing the signature "Aquil Abdulamiar" over and over. I did this in Ala's home, under his supervision. He also told things to do and things to say when I was in the Middle East Bank. We rehearsed these things over and over.

Ala:

A few days after meeting with [redacted], I told him what name to tell Michael Flynn to put on the checks and to also inform Michael Flynn that I was ready to open the account.

Sometime in early June 1982, I met with [redacted] in Boston. [redacted] gave me an envelope with \$5,000 and said that it was from Michael Flynn to me. [redacted] gave me another envelope from Michael Flynn which had the two counterfeit checks. [redacted] also told me that Michael Flynn wanted me to check into the Marriott Hotel in Fort Lauderdale, Florida, one day after the account is opened and the two checks are deposited. Michael Flynn said that he will also be in Florida at this time. Mr. Flynn will contact you at the Hotel. [redacted] then said [redacted] sends his regards and wishes you good luck.

Two days before the checks were deposited I called the Middle East Bank in New York City and

relationship with him on the phone. Then I told him I would be in touch and would call him again.

The next day I called the bank and spoke with the manager again. I told him I was not sure when I would be coming to New York. My brother's son was a student in the USA and he was going to deposit two checks which I received from people I had sold real estate to. I asked the manager of the bank to deposit the checks and told him the boy's name is Aquil. I asked the manager to help Aquil with what needs to be done to open the account. He said he would. He was very nice and told me that he hoped to see me soon.

Akil:

Ala possessed the business card of a person connected to the Middle East Bank. I cannot remember his name at this time. Ala told me that he had spoke to a person on the phone at the Middle East Bank by the name of [redacted]. Ala said that he told this person that he was a big businessman in Beverly Hills, California. Ala did not give [redacted] his correct name. Ala told [redacted] that he wanted to open an account at the Middle East Bank and dropped the name of some important person who worked at the Middle East Bank. Ala told me that he told [redacted] that he was too busy to come to the bank himself and asked [redacted] if it would be all right if his nephew, Aquil Abdulamiar, brought two large checks to the bank and opened the account. Ala told [redacted] that Aquil Abdulamiar was a student

later took to the Middle East Bank.

Ala:

Akil went to the bank and met the manager. Akil gave him the checks and did his best to open the account. Akil either forgot his real identification or decided not to use it. Akil later told me that he was real nervous in the bank. I also had a man go with Akil. This man waited outside. After Akil left the bank, he flew to Florida and met me. I was already in Florida with my bodyguard, [redacted].

Akil:

I received a phone call from Ala. Ala told me that he was at the Marriott Hotel in Fort Lauderdale, Florida. Ala told me to take the counterfeit checks to the Middle East Bank the following day or the day after. Ala gave me final instructions, including the flying time to New York from Washington and the weather conditions for the last few days in Washington. Ala told me that someone might ask me these questions in the bank. Ala also told me that another person was going to accompany me to New York, but this person was not to be seen by anyone at the bank. Ala said that I was supposed to phone him as soon as I opened the account and just before I was to catch a plane to Fort Lauderdale.

A day or two later, the other person and I flew from Boston to New York. I believe that we purchased the tickets when we were flying on the plane to New York. I think that we flew on Eastern Airlines. [redacted] waited for me at La Guardia Airport. We decided on a location to later meet at the airport. Ala had given me the address of the Middle East Bank. I caught a cab at the airport and went directly to the location of the Middle East Bank. I was wearing a grey suit, a white shirt and black shoes. I also had on a tie.

I had the business card that Ala had given me and the envelope containing the two counterfeit checks. I entered the building and took the elevator several stories up to the floor where the Middle East Bank was located. There was [redacted] in the reception room of the bank. She asked if she could help me. I showed her the card I had and asked to speak to [redacted]. I told her I was Aquil Abdulamiar. I looked to see if there were any cameras in the bank, as Ala told me to do, but I didn't see any. She phoned somebody and told me that [redacted] would see me in about five minutes. She asked if I wanted some coffee.

About five or ten minutes later, [redacted] walked into the reception area from the bank's inner offices located to the right of the reception room. [redacted] greeted me. He appeared to be a Pakastani about thirty-five years of age. He was tall and, compared to most Pakistanis, was light-complected.

[redacted] asked me to follow him to his office. We walked down the corridor and turned right. We walked down another corridor. I think to the left, and went into his room. I don't recall seeing a window facing outside in his office. I sat down and [redacted] asked me how my uncle was, and when the last time was that I saw my uncle. I gave him the answers that Ala had rehearsed with me. About this time, another bank Manager walked into [redacted] office. I was introduced to this man but I can't remember his name.

[redacted] asked me about my flight and how the weather was in Washington. I told him the things Ala had told me. I was offered coffee. I answered all of the questions [redacted] and the other man were asking me, but I never asked them any questions, just like Ala had told me. During the entire time I was with [redacted], [redacted] would enter the office and then leave. I cannot recall exactly when he was there and when he wasn't.

[redacted] asked me if I had something for him. I handed him the envelope containing the two counterfeit checks. He removed the checks and examined them. He made some kind of joke about me being a rich man. [redacted] told me to endorse the checks and handed me one. I took



Akil: "I practiced writing the signature 'Aquil Abdulamiar' over and over. I did this in Ala's home, under his supervision."

spoke with the manager. I told him my name was Hamed; and I was calling from the Beverly Hills Hotel in Los Angeles, California. I told him that I was from the United Arab Emirates and good friends of the Al Fotame family and I was doing some business in the United States. I told him I would like to open an account with the Middle East Bank but I cannot find the time and I do not know when I'll be in New York. The manager was very nice to me. He said that he wished to see me soon and meet me. I was building some friendly

in Washington. I drove with [redacted] and met someone sitting in a parked car at a prearranged location. [redacted] gave me an envelope and said that only I was to ever touch the envelope and its contents. [redacted] had a cast on his hand. I noticed it when he handed me the envelope. I took the envelope and took it home. It contained the two counterfeit checks which I

it between my first and second fingers on my left hand so I wouldn't leave any fingerprints on the check, just like Ala had instructed. I endorsed the check using my right hand and pushed the check across the desk to [REDACTED], using the four fingers on my left hand. I instantly realized that I had just put my four fingerprints on the rear of the check. Ala had told me never to leave any fingerprints on the checks. I was very nervous the whole time I was in the bank. But when this happened, I got even more nervous and I became scared. [REDACTED] then handed me the second check. I took this between my first and second fingers on my left hand, just like the first check. I turned it over and signed the check. However, I was now so more nervous after placing four of my fingerprints on the first check, that I signed the check wrong. I wrote the name "Aquil" as I was supposed to but wrote the name "Abdulamiar" not as one word as I should have, but as two words. I wrote it as "Abdul Amiar." I just left this check on the desk. I didn't even push it back to [REDACTED]. [REDACTED] picked up this check and handed me a signature card to sign. I signed the card. I signed a total of three things in the bank, the two checks and the signature card.

[REDACTED] then asked me for I.D. I told him that I didn't bring any because I thought that it wasn't necessary to show I.D. when all I was doing was opening an account. [REDACTED] told me that it was necessary and it was really for my protection. I had my United Arab Emirates passport with me, but I decided not to use it because I was so nervous. I told [REDACTED] that the embassy, close to my school, had my passport because they were making some kind of school recognition papers for me. I told [REDACTED] that my father always told me to remember my passport number whenever I travel. I then told him my passport number from memory. He wrote it down.

[REDACTED] asked me if I could return the next day with I.D. I told him no because I had tests to take at school the next day and I had to fly home right after I left the bank. I left the checks with him. [REDACTED] was very friendly with me. He even gave me his business card and told me to give his regards to my uncle.

I think I was in the bank for about twenty minutes. I took the elevator to the street, exited the building and turned left. I walked two blocks, as Ala had instructed, and took a cab to La Guardia Airport. I met [REDACTED] who flew with me to New York at the prearranged location. He gave me a phone number to call. I phoned Florida and spoke to Ala. I told him that I had left the checks at the bank and the deal was on. I told Ala the flight that [REDACTED] and I were going to take to Fort Lauderdale.

[REDACTED] and I flew from La Guardia Airport to Atlanta, Georgia. We changed planes and flew to Fort Lauderdale. When we landed, we were met by Ala's bodyguard. [REDACTED] told me that he would watch my belongings and directed me to go outside and talk with Ala. I went outside and saw Ala standing.

Ala and I took a little walk. He asked me what had happened. I told him everything. He got very mad when he found out that I was not given an account number and had left the checks at the bank. Ala told me that after I had phoned him from La Guardia Airport and told him the deal was on, he phoned his people in Boston and told them that the account had been opened and the checks deposited. After a while, Ala calmed down and told me that I had done my best and to not worry. I had never opened an account at any bank in my life and really didn't understand the procedures. I was scared and nervous in the bank.

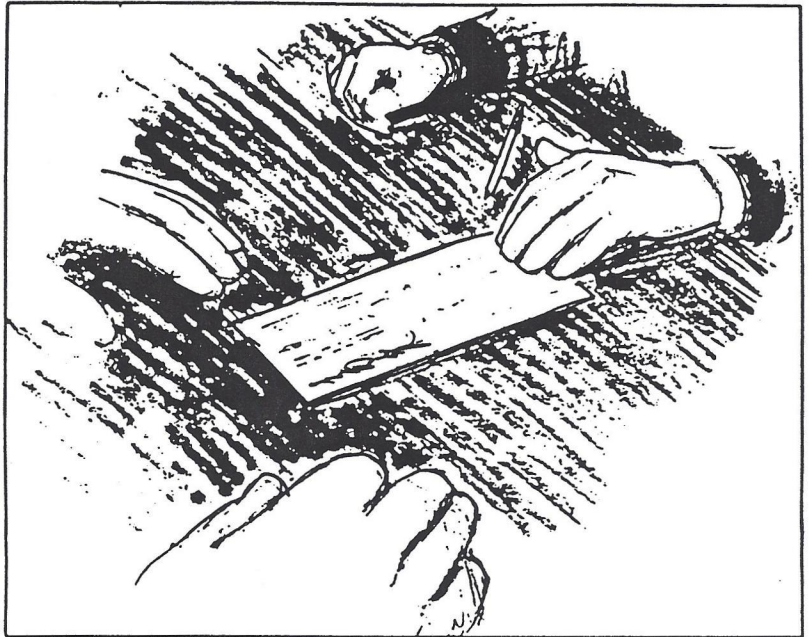
[REDACTED] drove all of us to the Marriott Hotel in Fort Lauderdale. The person who flew with me shared a room with me. Ala and [REDACTED] shared another room. The two rooms had an adjoining door between them. Ala and the rest of us stayed there another four or five nights

before leaving.

Ala:

Two days later, I received a phone call from Michael Flynn. I was at the Fort Lauderdale Marriott Hotel. Mr. Flynn asked to have dinner with me that evening. At 8:00 PM I was waiting outside the front door of the hotel for Mr. Flynn. A long dark American car pulled up. Mr. Flynn was driving. Mr. Flynn stopped the car, came out, shook my hand and opened the door for me. He

8:00 PM and we would go for a drink. I was a few minutes late and Akil walked me to the front door of the hotel. As we approached the front door, I saw Mr. Flynn standing outside next to his car waiting for me. Akil went to the hotel bar and I walked over to Mr. Flynn. We shook hands. He again opened my door and we drove to the same area as the sea food restaurant. Mr. Flynn took me to a nice bar. He was a combination restaurant and bar. It was on the water and had big windows



Akil: "I instantly realized that I had just put my four fingerprints on the rear of the check. Ala had told me to never leave any fingerprints on the checks. I was very nervous . . . but when this happened, I got even more nervous and I became scared."

was showing respect for me. We left in his car. He drove over a bridge, next to the hotel, and headed towards the Atlantic Ocean. We drove for about ten minutes and arrived at a sea food restaurant. Mr. Michael Flynn told me that the car he was driving was a rented car. The restaurant was on the coast. It was in the same area as a real tall building which I think is a hotel. I think the building has a revolving restaurant.

At the sea restaurant, Mr. Flynn told me he had opened an account in the Cayman Islands. Mr. Flynn said that as soon as the checks clear in Boston, he will know. Then, two days later, the money will be in the New York account. Mr. Flynn said that I would then make the arrangements to transfer the money to the Cayman Islands.

I asked Michael Flynn to give me the details of the Cayman Islands account, the name of the account and the name of the bank. Mr. Flynn said as soon as the money cleared in the Boston bank and his man called him from the Bank of New England, he would give me all the details.

Michael Flynn kept talking throughout dinner. Mr. Flynn told me that I was supposed to meet him and Wayne Hollingsworth in the Grand Cayman Island, after I made the money transfer, and Mr. Flynn would give me half a million dollars in cash. After dinner, Mr. Flynn drove me back to my hotel and said that he would call me.

Michael Flynn phoned me three or four days later at my hotel. He told me he would pick me up at

overlooking the water. We drank champagne and spent about one hour together. Mr. Flynn told me that the checks hadn't yet arrived in Boston and told me that I must call the bank in New York and see what is going on. Mr. Flynn said he would call me in two days. I was back in the hotel by 9:30 PM. I went to the hotel's night club and found my bodyguard, [REDACTED], and Akil having drinks. I told Akil that I had just had drinks with Mr. Flynn and that Michael Flynn had told me that the counterfeit checks Akil had deposited still hadn't arrived in Boston. I had on previous occasions informed Akil as to the roles played by Michael Flynn, Wayne Hollingsworth, [REDACTED] and [REDACTED].

Akil:

Twice during the stay, Ala told me that Michael Flynn was going to pick him up in the evening. I asked Ala if I could go with them. Ala said that Michael Flynn had given instructions that I was to never meet him or be seen with him. However, the second evening that Ala and Michael Flynn went out, I [REDACTED]. I decided to walk Ala to the front door of the hotel, next to the lobby. As we got to the front door, I saw Michael Flynn in the driver's seat of a large, dark colored, American car. The car was parked in the driveway, about 20 meters from the front door. The car [REDACTED]. Michael Flynn was looking in our direction

As soon as we got to the doorway, he got out of the car, walked behind it and walked to the passenger door. Ala told me that he was going, indicating I immediately stopped, about one meter outside the doorway and watched Ala walk over to Michael Flynn. I had of Ala and Michael Flynn. They shook hands, then Michael Flynn opened the front passenger door for Ala and Ala got in the car. Michael Flynn walked around the front of the car and got in the driver's seat. I walked thru the lobby and thru the hallway into the nightclub in the hotel. I sat with About one or two hours later, Ala returned to the hotel and met us in the nightclub. The nightclub has a disco and live entertainment area plus a restaurant.

Ala: The next day, I called the Middle East Bank and spoke with the same manager. He is from Pakistan. I asked if he deposited my checks. He was too nice to me on the phone. He said everything was okay and insisted that I must go to New York and see him. I did not like the way he was pushing. I felt something was wrong. I told him that I would be coming soon to New York and said good-bye.

Two days later, Ala called me at the Marriott Hotel. He gave me a number of a pay phone in Boston and told me to take phone change and call him in one hour from a pay phone. I did this and called him back. Ala told me to forget about the deal because the s---t had hit the fan in the Boston bank. Ala said that Michael Flynn's man in the Bank of New England called in Boston the night before and said that everyone in the bank is talking about the check forgery. Ala told me to be careful. Ala said to forget the whole deal. I said okay.

Ala: After we checked out of the hotel, Ala and I flew together from Fort Lauderdale to Boston. My brother, Amer, picked us up at Logan Airport in Boston. He drove us to Ala's home in his 928 black Porsche. The next day, Ala told me that the checks got caught and that Michael Flynn wanted me to get away from Boston as soon as possible. Ala picked me up and Ala told me to go with him. He drove me to a ski resort area close to Portland, Maine. I had a room on the first floor of the hotel. I think the hotel was two stories high. There were also small cottages on the property. I stayed there by myself. Because it wasn't the ski season, very few people were staying there. The restaurant wasn't even open. I stayed there about two weeks. When I was hungry, I had to walk to a delicatessen store about one mile away. About 300 meters past the delicatessen was a small pub where I would occasionally have a drink. Ala and I visited me at this hotel a couple times. Once, the three of us went for a ride to Vermont. During this ride, I overheard Ala and Michael Flynn talking about Michael Flynn and his involvement in the check forgeries. About four weeks after this, I flew home to the United Arab Emirates from Boston.

Additional information I saw Ala get in the car with in Fort Lauderdale, as I have previously stated. I know this man to be Michael Flynn. I have affixed the fingerprint of my right thumb, using purple ink, to the rear of the photograph. The signatures directly below which read "Aquil Abdulamiar" were written by me. This was how I endorsed the first check in the Middle East Bank in New York City. In addition, I have affixed all ten fingerprints, in black ink, to the last page of this declaration. This is on Page Twelve. I have also affixed my right thumbprint, in black ink, to the top right corner of each page of this declaration.

The previous statements were made freely and voluntarily. They are true and to the best of my knowledge.

Signed in Dubai, United Arab Emirates, this 10th day of May, 1984.

AKIL ABDUL AMIR AL FADILI AL TAMIMI
Witnessed by Eugene M. Ingram
Private Investigator
California License Number AA9387
1212 North Vermont Avenue
Los Angeles, California 90029

Ala: WAYNE HOLLINGSWORTH: Boston lawyer — office at the Union Wharf, Boston, Massachusetts. He is about 47 years old. He introduced me to Michael Flynn. He is about 43 years old, in Massachusetts. Very big bookmaker in Massachusetts. drives a black Mercedes Benz sports car. He is about 43 years old and works for and does his dirty work. was the contact between myself and and myself and Michael Flynn. MICHAEL FLYNN: Boston lawyer — offices at Union Wharf. He is about 43 years old. is the printer who made the forged checks. He is of a printing company in is about years old and works in the printing business. is the one who introduced me to the printer. saw the original checks and he received \$2,000 from me for introduce me to the printer.

In referring to the Bank of New England I am also referring to the New England Merchants National Bank, as the bank was previously known, prior to May 1982. Executed at Naples, Italy on the 5 day of May 1984.

The sketches in this special supplement were drawn by Peter Green, based on photographs wherever possible.



Ala: "Mr. Flynn stopped the car, came out, shook my hand and opened the door for me. He was showing respect for me."

BLOSSOMS OWNER HIDES CONTROVERSIAL PAST

Alleged Civil Rights Culprit Gains Federal Funding



Kevin Flynn, president of FAMCO, organized brutal "deprogrammings" aimed at boosting business for FAMCO.

by John Lawrence

Kevin Flynn, the subject of multi-million dollar lawsuits for alleged civil rights violations in Massachusetts and California and the brother of alleged criminal conspirator Michael J. Flynn, opened the Blossoms restaurant in late 1983 in the government-owned Post Office Pavilion in Washington, D.C.

The Small Business Administration (SBA) underwrote the Blossoms enterprise to the tune of \$250,000 of taxpayers' money, in the form of a loan guarantee.

Flynn's application to the SBA is under investigation due to some "inconsistencies" regarding his past.

The original application indicated that the Blossoms venture was being taken by the Flynn Company, presumably chartered in Massachusetts. Subsequent searching of records in Massachusetts revealed that no Flynn Company ever existed in the Commonwealth, but there is a Flynn Associates Management Corporation (FAMCO), formed by Flynn and some family members in 1980.

In April 1983, Flynn changed his SBA application to read that Blossoms was a venture of the General Business Management Corporation (GBMC), of Massa-

chusetts. Flynn also reported that he had been the president of Flynn Company since 1978.

Multi-Million Dollar Legal Action

The multi-million dollar suits against Flynn indicate that while he was with FAMCO, he had been involved in controversial "deprogramming" efforts, attempting to forcibly dissuade people from their religious beliefs.

Those successfully turned away from their commitments were then taken to Flynn's brother, attorney Michael J. Flynn. Michael Flynn then would attempt to persuade the victim to file suit against his former church. According to FAMCO documents, these suits were the corporation's main business.

FREEDOM is investigating the accusation that the same credit card used to pay deprogramming expenses for FAMCO is now being used by Kevin Flynn for GBMC business.

Thomas Hoffman, attorney for GBMC, wrote a letter in September 1983 stating that Kevin Flynn was not involved in any civil litigation. Hoffman, however, was fully aware that Flynn was embroiled in costly court proceedings.

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FAMCO

continued from page 1

Cheryl Flynn (Kevin's wife), and Michael Flynn.

The Flynn's soon began outlining their sordid intentions on paper. The purpose of FAMCO, as stated in the corporation's document entitled "Scientology — Review and Planning," written in early 1981, was "to position ourselves such that to fight us would be cost ineffective."

The document described a four-pronged attack:

1. Closing Scientology organizations
2. Adverse media (against the Church)
3. Adverse public reaction (against the Church)
4. Federal and state attacks (on the Church).

With the knowledge of FAMCO's plan, the purpose of filing separate suits in scattered locations suddenly becomes very clear. It was in line with FAMCO's

purpose to make it "cost ineffective" for the Church to fight.

According to an attorney for the Church, the suits were "designed to tax the Church of Scientology to the breaking point, to inconvenience and harass the institution so that it [would] be forced to settle with [Flynn] and to maximize the profits that [would] accrue to the lawyers."

In a promotional mailing sent to attorneys across the country, FAMCO included its "Class Action Case Development Program" in which Flynn promised that 1,000 lawsuits would be filed against the Church of Scientology by the end of 1981.

Conveniently Packaged

The Class Action Case Development Program offered the prospective attorneys a conveniently prefabricated package.

"We provide the clients,

the damages, the pleadings, the memoranda, the documents, the witnesses and virtually everything required for an instantaneous trial with little or no necessity for discovery."

the document stated.

As an added incentive, the FAMCO plan included instant press coverage. Flynn boldly listed the media outlets which he claimed to have in his pocket:

- a) UPI and AP wire services
- b) "60 Minutes"
- c) TIME magazine
- d) "Prime Time"
- e) The Reader's Digest
- f) The Saint Louis Post-Dispatch
- g) The Las Vegas Review Journal
- h) ABC TV in San Francisco
- i) The Clearwater Sun
- j) The National Enquirer
- k) the authors of the book Snapping

- l) The Riverside Free Press
- m) The Los Angeles Times
- n) The Boston Globe

Flynn also claimed to have wit-

nesses available to assist in corroborating his stories for these media. Omitted from his promotional literature, however, was the fact that several of his "witnesses" had been promised immunity for past crimes in exchange for their "testimony," a fact which would lower their credibility in the eyes of journalists.

Case Thrown Out

Flynn is known to have written "affidavits" and "declarations" which his clients have submitted in court. At least one such document authored by Flynn backfired in his client's face.

Flynn was found in contempt and his client, Ronald DeWolf, was ordered to pay court costs in a Riverside, California, probate case. Flynn had written the original declaration, signed by DeWolf, containing outrageous and scurrilous lies which both he and his client then loudly spread to the media. His lies were exposed,

continued on page 14

FAMCO

continued from page 13

however, when the judge threw the case out altogether.

Loss of Business

Another target on the FAMCO plan to make it "cost ineffective" for the Church to fight was to foment a "loss of business" for the Church itself.

Members were to be induced to

defect from the Church by continued exposure to FAMCO anti-Church propaganda. The defectors were to be organized into groups with FAMCO assistance and make themselves readily available for other "potential defectors."

Kevin Flynn, Deprogrammer
Even with such an impressively



Michael Flynn is a central figure in a FAMCO-aided criminal conspiracy.

pre-packaged plan, the Flynn brothers and their FAMCO front corporation could not muster the business they needed to bring their plan to fruition. A more aggressive recruitment method was required.

Influenced by Massachusetts psychiatrist John Clark, well-known for his hatred of religion, the Flynns chose to use a modern psychiatric mind control tool colloquially known as "deprogramming."

This method of "curing" people of their religious convictions had obvious appeal for the Flynn brothers. Deprogramming involves kidnapping, beating, raping and any other physical or mental torture required to "free" the victim of his commitments and beliefs.

Kevin Flynn took charge of these "recruitment" actions. He was a natural for directing FAMCO's deprogramming actions, according to one investigator, due to his reported connections to certain people with interests in drug dealing and related activities. Kevin put together an effective team of thugs to perpetrate the kidnappings and torture.

Teamwork

The Flynn brothers worked as a team. After a person had been forced through Kevin's depro-

gramming process, he would be taken to Michael to be convinced that he should now sue.

According to Kevin, he brought at least eight such potential clients to his brother Michael.

Their teamwork, however, was unsuccessful. As fate would have it, a number of these deprogramming victims turned around and sued the FAMCO brothers.

Fraud Denied

As the scandalous details of FAMCO's activities became public knowledge, Michael Flynn denied ever having implemented his sinister FAMCO plans to destroy the Church. To have done so, Flynn stated, would have created "the appearance of impropriety."

In spite of Michael Flynn's denials, the activities of the now-infamous FAMCO clearly show that he, his brother and others have followed their plans to the letter.

The fact that they have been wholly unsuccessful in their conspiracy does not cancel the documented evidence that they used their front corporation, FAMCO, and its successor, General Business Management Corporation (GBMC), to commit one of the most vicious and insidious frauds ever perpetrated against a recognized religion in the history of the First Amendment. Δ

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"Flynn told him, 'Do not f--- us because you have a brother and son in Boston'."

FORGERY

continued from page 4

Flynn took the opportunity to threaten Tamimi. According to Tamimi's declaration, Flynn intimated that Tamimi's family would be in danger if Tamimi did not follow through with his end of the bargain.

According to Tamimi's sworn statement, Flynn told him, "Do not f---k us because you have a brother and a son in Boston."

In describing the course of the intensive six-month inquiry, Jentzsch said that investigators had traced the path of the conspi-

racity through more than a dozen cities — from Boston and New York to Clearwater, Florida, the Cayman Islands and finally to Italy and Dubai and Sharjah in the United Arab Emirates. "The documentation is explicit and complete," he added. "We have corroborative witnesses and documents, including photographs, that completely verify the criminal conspiracy."

Breakthrough

A breakthrough came when Ingram located Ala Tamimi and his brother Akil overseas.

Faced with the possibility of an additional federal indictment and lengthy legal proceedings in Italy and the United States, Ala Tamimi

agreed to detail his involvement with the hope that cooperation would lessen the charges against him in the United States.

Every detail in Tamimi's account was fully corroborated by independent investigation in the United States.

Rev. Jentzsch stated, "A portion of the results of the international inquiry were made available to Randolph and his client when Kevin Flynn attacked the Church in the Miller case. The links to organized crime have also been given to the federal prosecutors.

"We have the proof that the entire probate case was not only a fraud but was also based on a felony," Rev. Jentzsch stated. "Flynn

is a criminal who will stop at nothing to make a buck. He is worse than immoral. He has defrauded not only the courts but also the media and even his own clients for the sake of his personal greed."

Rev. Jentzsch stated that the Church is continuing its investigation into "other crimes" uncovered during the two-year probe.

"Make My Day"

When asked if he expected Flynn to respond with a libel suit, Rev. Jentzsch said, "Flynn cannot afford to answer these charges under oath. His life cannot survive scrutiny. So give him this message: 'Go ahead. Make my day'." ▲

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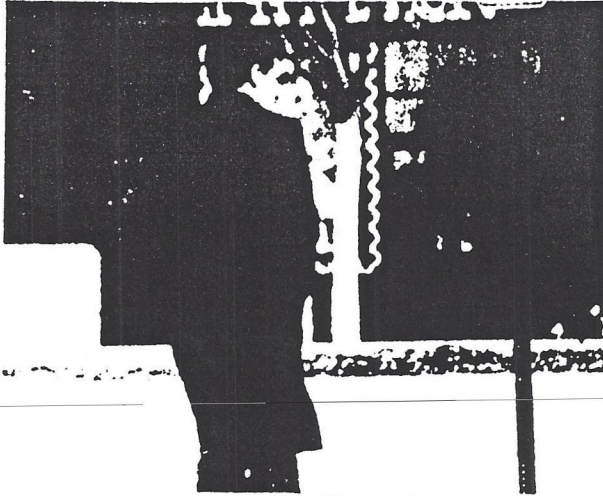
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Kevin Flynn, subject of SBA investigation.

BLOSSOMS

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At the time of his letter, which was included as part of the SBA loan application, Hoffman had appeared and testified in a case against Flynn in California. The SBA application made no mention whatsoever of ongoing litigation by either Flynn or his attorney.

SBA Investigation

Because a stunning 65 per cent of SBA loans in the D.C. region are in what the agency calls "troubled status," the SBA has taken an interest in Flynn's situation. Reports have been generated to other agencies as well, reaching the U.S. Senate Committee on Small Business and even the

White House.

Although the inspector general's office of the SBA is being tight-lipped about the investigation, it has been learned that Flynn may have deliberately lied on his application to hide his previous FAMCO activities.

According to one investigator, the SBA looks into the character of the applicant, and Flynn's dealings while in FAMCO would quite likely have been considered "of a questionable nature."

Looking into the area of FAMCO, the investigator confided, would have led to "findings likely rendering a denial of the loan application."

Making false statements on an SBA loan application is a felony under federal law. **a**

NEXT ISSUE:

BRIBERY, EXTORTION AND MURDER AT BUTLER CHEVROLET

In the 1970's, the automobile world was shaken by the massive fraud and corruption uncovered after the murder of a General Motors warranty inspector. This article reveals heretofore unknown information regarding Michael Flynn's role in suppressing the true extent of corruption by threats, bribery and intimidation.

THE SECRETS OF WAYNE HOLLINGSWORTH

Underworld connections, criminal conspiracy — these are old hat to Wayne Hollingsworth. This article reveals some of Hollingsworth's startling secrets and leaves you with one question: Would you hire this man as your attorney?

BLOSSOMS: CAN A RESTAURANT BE A LAUNDRY, TOO?

When investigators began to probe the individual investors in one of Washington, D.C.'s newest restaurants, they stumbled on a drug smuggling ring.

MULTI-MILLION DOLLAR CONSPIRACY, PART II

Not all has yet surfaced regarding Michael Flynn's forged check conspiracy and Ronald DeWolf's failed probate bid. This article exposes still more of the conspiracy and the facts behind the probate scam.